

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DISTRICT**

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BEVERLY WATSON,

Plaintiff,

v.

C. R. BARD, INC. and BARD  
ACCESS SYSTEMS, INC.,

Defendants.

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Civil Action No.  
2:17-cv-00210-MHH

**JOINT MOTION TO CONTINUE SCHEDULING CONFERENCE**

Come now the parties to the above-styled action, through counsel, and move the Court to continue the Scheduling Conference set on Monday, April 9, 2018 at 2:30 p.m. As grounds, the parties show as follows:

1. On October 18, 2017, the parties met with the Court and agreed to get certain fact discovery initiated in time to be completed in advance of a January 25, 2018 follow-up Scheduling Conference.
2. On January 17, 2018, the parties requested and were granted an additional sixty (60) days to complete record gathering and initial discovery.
3. Although the parties have been cooperating diligently to get the discovery accomplished, the work of obtaining medical records and other records from third parties has not yet been completed, and the parties agree that those records are

necessary for the depositions of the plaintiff and her treating physicians to be efficiently completed.

4. The parties agree that more time is needed to obtain discovery to ensure that a case management conference is productive.

5. Also, the parties are engaged in settlement discussions, and additional time should be sufficient for the parties to determine if early resolution of the matter will be possible.

6. Therefore, the parties request that they be given an additional thirty (30) days to complete record gathering and initial discovery, and that a follow-up scheduling conference be set on or after May 9, 2018.

Respectfully submitted, this 2<sup>nd</sup> day of April, 2018.

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